



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

NOV 30 1992

Mr. Gary Baughman
Colorado Department of Health
4210 E. 11th Ave.
Denver, CO 80220

Re: OU 15 Final Phase I RFI/RI
Work Plan Approval

Mr. Baughman:

EPA has reviewed the OU 15 Final Phase I RFI/RI Work Plan and recommends approval upon resolution of the following concerns.

DOE intends to remove Individual Hazardous Substance Site (IHSS) 212 from the OU 15 schedules of the IAG and address the closure in the Mixed Residue Permit Modification as RCRA Unit 63. The permit closure plan will need to specifically address radioactive contamination and cleanup of the unit. Corrective Action beyond the unit must be performed pursuant to the IAG. This approach is acceptable to EPA if the Mixed Residue Permit Modification, specifically Part VIII of the permit, can be approved by CDH. The permit modification, at least for Unit 63, should be reviewed and approved by CDH before final acceptance of this approach. It should also be clearly stated in the RFI/RI Work Plan that inclusion of RFI/RI work for RCRA Unit 63 in the Mixed Residue Permit Modification does not remove the IHSS from the IAG. DOE will ultimately need to issue a CERCLA decision document closing the unit.

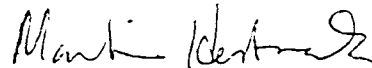
IHSS 204, the original uranium chip roaster, is included in the OU 15 RFI/RI Work Plan. It is EPA's understanding that this unit will continue to operate for the purpose of oxidizing uranium "chips" that are not contaminated with RCRA hazardous waste. The RCRA closure status of this unit is unclear and should be clarified before proceeding with the RFI/RI Work Plan. If the chip roaster has been RCRA closed then it is not necessary to sample and analyze for RCRA hazardous waste. If it has not been RCRA closed the RFI/RI should be consistent with a RCRA

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closure plan for hazardous waste constituents. At this time sampling and analysis for radioactive contamination seems pointless because continued use will re-contaminate the unit which will require the unit to be re-addressed when the operation is discontinued. The radioactive contamination portion of the RFI/RI work for IHSS 204 should therefore be delayed until that time and coordinated with RCRA/CERCLA activities associated with facility decontamination and decommissioning.

If you have any questions please contact Dave Maxwell of my staff at (303) 294-1082.

Sincerely,

A handwritten signature in dark ink, appearing to read "Martin Hestmark". The signature is fluid and cursive, with a stylized "M" and "H".

Martin Hestmark, Manager
Rocky Flats Project